

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

*December 03, 2024*

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA,	§	
	§	
v.	§	Criminal Action No.: H-4:17-cr-00651-S
	§	
(6) WILLIAM ALBERTO LOPEZ,	§	
a/k/a WILLIAM ALBERTO LOPEZ-MORENO,	§	
a/k/a DAVID MALDONADO, a/k/a "PAYOSO,"	§	
a/k/a "PAYASO," a/k/a "PRINCIPAL";	§	
	§	
(7) ISRAEL JUAREZ SIFUENTES,	§	
a/k/a "CERILLO";	§	
	§	
(15) RAUL MORENO-REYNA,	§	
a/k/a "CONEY,"	§	
	§	
(19) ANADALIT DUARTE,	§	
a/k/a "PAOLA,"	§	
a/k/a ANN DALIT DUARTE GARCIA,	§	
	§	
(23) JUAN CARLOS CONTRERAS	§	
CERVANTES,	§	
a/k/a "CARLOS";	§	
	§	
_____ Defendants.	§	

**SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

**INTRODUCTION**

At all times material to this Superseding Indictment:

1. The Southwest Cholos ("SWC") is a criminal organization based in Southwest Houston. In addition to its members, SWC also has associates operating throughout Texas, Mexico, and Central America who act in furtherance of its criminal scheme.

2. SWC members and associates are engaged in a variety of criminal conduct, including, but not limited to, sex trafficking, the smuggling of illegal aliens into and within the United States, drug trafficking, and the sale of illegal and stolen weapons.

3. Defendants (1) FREDDY MONTES, a/k/a KING MONO (“KING MONO”), (2) GIOVANI ALEXANDER ALECIO, a/k/a WHITEBOY (“WHITEBOY”), (5) MARIA ANGELICA MORENO-REYNA, a/k/a PATTY (“PATTY”), and (6) WILLIAM ALBERTO LOPEZ (“WILLIAM”) are four leaders and members of SWC. KING MONO and WILLIAM are two of PATTY’s sons.

4. Another SWC leader and member is (8) ERIK IVAN ALVAREZ-CHAVEZ (“IVAN”). IVAN is PATTY’s common law husband.

5. In addition to KING MONO and WILLIAM, three of PATTY’S other sons are also SWC leaders and members. They are (13) WALTER LOPEZ (“WALTER”), (14) EDDIE ALEJANDRO TORRES, a/k/a MONTERREY (“MONTERREY”), and (16) JOSE LUIS MORENO, a/k/a LUCKY (“LUCKY”).

6. SWC is using the Carriage Way Apartment Complex, located at 6011-6023 Dashwood, in Houston, Texas as one of its centers of operations for its criminal activities. SWC is also using other locations of operations in Houston, Texas, the Rio Grande Valley (Cameron, Hidalgo, Starr, and Webb Counties, Texas), and Cancun, Mexico.

### **SEX TRAFFICKING AND PROSTITUTION SCHEME**

7. One of SWC’s criminal activities has been to operate brothels where girls and women work as prostitutes.

8. MAVM, EMR, AP, and ABP were adult females whom SWC members and associates forced, threatened, defrauded, and coerced into engaging in prostitution in Houston,

Texas. Specifically, at all times material to this Superseding Indictment, MAVM, EMR, AP and ABP were individuals who were recruited, enticed, harbored, transported, provided, obtained and maintained in reckless disregard of the fact that means of force, threats of force, fraud, and coercion were used to cause them to engage in commercial sex acts that affected interstate and foreign commerce. They were also imported, transported and travelled in foreign commerce into the United States to engage in prostitution, and held, kept, maintained, controlled supported, employed and harbored in the United States in pursuance of such illegal importation, all of which were due to acts of inducement, enticement, and coercion by one or more of the defendants and their co-conspirators known and unknown to the Grand Jury.

9. NGL was a girl who, beginning at age 14, SWC members and associates caused, recruited, enticed, harbored, transported, provided, obtained and maintained to engage in prostitution for their financial benefit. SWC members and associates did so knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion were used to cause her to engage in a commercial sex act that affected interstate and foreign commerce.

10. NGL, MAVM, EMR, AP, and ABP, are collectively referred to in this Superseding Indictment as “sex trafficking victims.”

11. BAS is an adult female that SWC members and associates imported and transported in foreign commerce into the United States to engage in prostitution and who SWC members and its associates held, kept, maintained, controlled, supported, employed and harbored in the United States as a prostitute in a brothel controlled by SWC and its associates.

12. a. NGL, MAVM, EMR, AP, ABP, and BAS were all employed by SWC as prostitutes in brothels SWC and its associates controlled, and MAVM, EMR, AP, ABP, and BAS were all smuggled illegally into the United States by SWC and its associates for that purpose.

b. For MAVM, EMR, AP, ABP, and BAS, SWC members and associations would make arrangements for them to cross into the United States illegally for the purpose of working as a prostitute and engaging in commercial sex acts in a “brothel” controlled by SWC members and associates. SWC members and associates would also provide a hotel, house or “stash house” in the vicinity of the United States-Mexico border for them to reside at following their illegal entrance into the United States. SWC members and associates would also transport or make arrangements for their transportation from the United States-Mexico border region of Texas to the Houston, Texas vicinity.

13. SWC members and associates used force, threats of force, fraud, and coercion in order to make their sex trafficking victims engage in prostitution. SWC members would often create a “debt” on the part of the sex trafficking victim, such as by smuggling them into the United States, harboring them here illegally, and by convincing them to live in “safe residences” in the United States. In order to pay off that debt, SWC required these sex trafficking victims to engage in commercial sex acts at brothels controlled and operated by SWC members and associates.

14. As part of this sex trafficking scheme, SWC members and associates would lie to their sex trafficking victims by falsely telling them they were going to work in a restaurant when, in fact, they would work in brothels controlled and operated by SWC members and associates.

15. As part of this sex trafficking scheme, SWC members and associates would tattoo their names and nicknames on the body of their sex trafficking victims, including NGL, EMR, AP, ABP, and MAVM.

16. As part of this sex trafficking scheme, SWC members and associates would assault, and threaten to assault, their sex trafficking victims and family members of their sex trafficking victims.

17. As part of this sex trafficking scheme, SWC members and associates would instruct their sex trafficking victims how much to charge individuals for each commercial sex act, and then divide a portion of the proceeds from the commercial sex act amongst SWC members and associates.

17a. CYOP was a girl who, while under age 18, SWC members and associates attempted to cause, recruit, entice, harbor, transport, provide, obtain, and maintain to engage in commercial sex acts that affected interstate and foreign commerce. SWC members also attempted to import CYOP, transport CYOP, and have CYOP travel in foreign commerce into the United States to engage in prostitution, and attempted to hold, keep, maintain, control, support, employ and harbor into the United States in pursuance of such illegal importation due to acts by one or more of the defendants and their co-conspirators known and unknown to the Grand Jury.

#### **ALIEN SMUGGLING**

18. Another of SWC's criminal activities was to smuggle aliens into, and transport and harbor them in, the United States in exchange for a fee.

19. BAS, EB, VRG, EEMH, AQF, HSB, JVM, AL, CC, and WP (collectively referred to as "aliens,") are all individuals who do not have United States citizenship, but whom paid a fee to human smuggling organizations in order to be smuggled into the United States without permission and then transported to specific locations in the United States. SWC was a part of and worked with these human smuggling organizations to smuggle, transport, and harbor the aliens.

20. As part of this human smuggling scheme, SWC members and associates would assist the aliens in crossing the United States-Mexico international border without inspection at a place other than a designated port of entry.

21. As part of this human smuggling scheme, SWC members and associates would

transport the aliens to one of many “stash houses” located in the Rio Grande Valley.

22. As part of this human smuggling scheme, SWC members and associates would conceal, harbor, and shield from detection the aliens at a stash house, and transport them between stash houses.

23. As part of this human smuggling scheme, SWC members and associates would transport the aliens through and past a United States Border Patrol checkpoint, including checkpoints located in Sarita, Texas and Falfurrias, Texas.

24. As part of this human smuggling scheme, SWC members and associates would transport the aliens to an area north of the United States Border Patrol checkpoint to another stash house located in or near Houston, Texas.

25. As part of this human smuggling scheme, SWC members and associates would conceal, harbor, and shield from detection the aliens at a stash house located in or near Houston, Texas.

26. In exchange for these illicit services, SWC members and associates would receive a fee from the aliens, directly or through the larger human smuggling organization. The fee varied by alien. Some aliens paid prior to passage into the United States. Some aliens paid a portion of their earnings in the United States after they illegally entered. SWC members and associates received a portion of the fee in exchange for their smuggling services.

### **COUNT ONE**

#### **Conspiracy to Engage in Sex Trafficking by Means of Force, Threats, Fraud, and Coercion**

Paragraphs 1 through 26 of the Superseding Indictment, and Counts Two through Six and Court Thirty-Eight of the Superseding Indictment, are re-alleged and incorporated herein by reference.

Beginning on or about January 10, 2009, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

RAUL MORENO-REYNA, a/k/a “CONEY,” and

ANADALIT DUARTE, a/k/a “PAOLA,” a/k/a ANN DALIT DUARTE GARCIA,  
defendants herein, conspired with each other and others known and unknown to the grand jury to knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means in and affecting interstate and foreign commerce, and to knowingly benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained in an affecting interstate and foreign commerce, CYOP, NGL, MAVM, EMR, AP, and ABP, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause NGL, MAVM, EMR, AP, and ABP to engage in commercial sex acts, and knowing and in reckless disregard of the fact that CYOP and NGL had not attained the age of 18 years and that CYOP and NGL would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1594(c).

## **COUNT TWO**

### **Sex Trafficking of a Minor by Means of Force, Threats, Fraud, and Coercion**

Beginning on or before February, 1, 2013, and continuing until on or about May 31, 2013, in the Southern District of Texas,

ANADALIT DUARTE, a/k/a “PAOLA,” a/k/a ANN DALIT DUARTE GARCIA,

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly, in an affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit NGL, a person that had not attained the age of 18 years, and benefited financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing and soliciting by any means NGL, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause NGL to engage in a commercial sex act, and (2) NGL, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a), (b), and (c) and 2.

### **COUNT THREE**

#### **Sex Trafficking by Means of Force, Threats, Fraud, or Coercion**

Beginning on or before January 1, 2009, and continuing until on or about December 31, 2011, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain “MAVM,” knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and combination of such means would be used to cause “MAVM” to engage in a commercial sex act.



In violation of Title 18, United States Code, Sections 1591(a) and 2.

**COUNT FOUR**

**Sex Trafficking by Means of Force, Threats, Fraud, or Coercion**

Beginning on or before April 20, 2012, and continuing until on or about July 18, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO, a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,” a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly, in an affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain “EMR,” knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and combination of such means would be used to cause “EMR” to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 2.

**COUNT FIVE**

**Sex Trafficking by Means of Force, Threats, Fraud, or Coercion**

Beginning on or before September 1, 2012, and continuing until on or about September 30, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO, a/k/a DAVID MALDONADO, a/k/a “PAYSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,” a defendant herein, aided and abetted others known and unknown to the grand jury, did knowingly, in an affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain “AP,” knowing and in reckless disregard of the fact that means of force, threats of

force, fraud, and coercion, and combination of such means would be used to cause “AP” to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 2.

**COUNT SIX**

**Sex Trafficking by Means of Force, Threats, Fraud, or Coercion**

Beginning on or before April 1, 2016, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly, in an affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain “ABP,” knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and combination of such means would be used to cause “ABP” to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 2.

**COUNT SEVEN**

**Conspiracy to Conduct Transportation to Engage in Prostitution**

Beginning on or about January 10, 2009, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,” and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to knowingly transport and cause the transportation of individuals in foreign commerce with intent that such individuals engage in prostitution, in violation of Title 18, United States Code, Section 371.

MANNER AND MEANS

The unlawful conspiracy was accomplished in the manner and means alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Eight through Twelve of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed in the Southern District of Texas the overt acts alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Eight through Twelve of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

COUNT EIGHT

Transportation to Engage in Prostitution

Beginning on or before January 1, 2009, and continuing until on or about December 31, 2011, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by other persons known and unknown to the grand jury, did knowingly transport and cause the transportation of an individual “MAVM” in interstate and foreign commerce with intent that such individual engage in prostitution.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

**COUNT NINE**

**Transportation to Engage in Prostitution**

Beginning on or before April 20, 2012, and continuing until on or about July 18, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly transport and cause the transportation of an individual “EMR” in interstate and foreign commerce with intent that such individual engage in prostitution.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

**COUNT TEN**

**Transportation to Engage in Prostitution**

Beginning on or before September 1, 2012, and continuing until on or about September 30, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly transport and cause the transportation of an individual “AP” in interstate and foreign commerce with intent that such individual engage in prostitution.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

**COUNT ELEVEN**

**Transportation to Engage in Prostitution**

Beginning on or before April 1, 2016, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly transport and cause the transportation of an individual “ABP” in interstate and foreign commerce with intent that such individual engage in prostitution.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

**COUNT TWELVE**

**Transportation to Engage in Prostitution**

Beginning on or before April 12, 2017, and continuing until on or about April 19, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly transport and cause the transportation of an individual “BAS” in interstate and foreign commerce with intent that such individual engage in prostitution.

In violation of Title 18, United States Code, Sections 2421(a) and 2.

**COUNT THIRTEEN**

**Conspiracy to Entice and Coerce Another to Travel  
in Interstate or Foreign Commerce for Prostitution**

Beginning on or about January 1, 2009, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to induce, entice and coerce others travel in foreign commerce with intent that those individuals engage in prostitution and sexual activity for which a person can be charged with a criminal offense., in violation of Title 18, United States Code, Section 371.

**MANNER AND MEANS**

The unlawful conspiracy was accomplished in the manner and means alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Fourteen through Seventeen of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

**OVERT ACTS**

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed in the Southern District of Texas the overt acts alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Fourteen through Seventeen of this Superseding Indictment which are re-alleged and incorporated herein by reference.

**COUNT FOURTEEN**

**Enticing and Coercing Another to Travel in Interstate or Foreign Commerce for Prostitution**

Beginning on or before January 1, 2009, and continuing until on or about December 31, 2011, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other and others known and unknown to the grand jury, did knowingly induce, entice and coerce “MAVM” to travel in foreign commerce, from Mexico to Texas, with intent that “MAVM” engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(a) and 2.

**COUNT FIFTEEN**

**Enticing and Coercing Another to Travel in Interstate or Foreign Commerce for Prostitution**

Beginning on or before April 20, 2012, and continuing until on or about July 18, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly induce, entice, and coerce “EMR” to travel in foreign commerce, from Mexico to Texas, with intent that “EMR” engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(a) and 2.

**COUNT SIXTEEN**

**Enticing and Coercing Another to Travel in Interstate or Foreign Commerce for Prostitution**

Beginning on or before September 1, 2012, and continuing until on or about September 30, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly induce, entice and coerce “AP” to travel in foreign commerce, from Mexico to Texas, with intent that “AP” engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(a) and 2.

**COUNT SEVENTEEN**

**Enticing and Coercing Another to Travel in Interstate or Foreign Commerce for Prostitution**

Beginning on or before April 1, 2016, and continuing until on or about May 5, 2017 in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly induce, entice, and coerce “ABP” to travel in foreign commerce, from Mexico to Texas, with intent that “ABP” engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

In violation of Title 18, United States Code, Sections 2422(a) and 2.



**COUNT EIGHTEEN**

**Conspiracy to Bring In, Transport, Move, Conceal, Harbor,  
and Shield From Detection Illegal Aliens**

Beginning on or about April 17, 2017, and continuing until on or about July 24, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to knowingly and in reckless disregard of the fact that certain aliens had come to, entered, or remained in the United States in violation of law, transport, move, conceal, harbor, shield from detection, and conspire to transport, move, conceal, harbor, and shield from detection such aliens within the United States, and did so in furtherance of the aliens entering or remaining in the United States in violation of law, and did so for the purpose of commercial advantage and private gain, and in so doing, did place the lives and physical safety of said aliens in jeopardy.

In violation of Title 8, United States, Code, Sections 1324(a)(1)(A)(ii), (iii) and (v)(I), and 1324(a)(1)(B)(i), and (iii).

**MANNER AND MEANS**

The unlawful conspiracy was accomplished in the manner and means alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Nineteen through Twenty-one of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

OVERT ACTS

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed in the Southern District of Texas the overt acts alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Nineteen through Twenty-one of this Superseding Indictment which are re-alleged and incorporated herein by reference.

COUNT NINETEEN

Transporting, Moving, Concealing, Harboring, Shielding From Detection, and Conspiring to Transport, Move, Conceal, Harbor and Shield From Detection Aliens

On or about April 19, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

defendants herein, aided and abetted by each other and others known and unknown to the grand jury, did knowingly and in reckless disregard of the fact that a certain alien had come to, entered, or remained in the United States in violation of law, transport, move, conceal, harbor, shield from detection, and conspire to transport, move, conceal, harbor, and shield from detection such alien within the United States, and did so in furtherance of the aliens entering or remaining in the United States in violation of law, and did so for the purpose of commercial advantage and private gain.

In violation of Title 8, United States, Code, Sections 1324(a)(1)(A)(ii), (iii) and (v), and 1324(a)(1)(B)(i).

**COUNT TWENTY**

**Conspiracy to Import Aliens for Immoral Purposes**

Beginning on or about January 10, 2009, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,” and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to knowingly import into the United States, aliens for the purpose of prostitution, and did knowingly hold aliens in pursuance of the importation of said aliens into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor aliens in pursuance of the importation of said aliens into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 371.

**MANNER AND MEANS**

The unlawful conspiracy was accomplished in the manner and means alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Twenty-three through Twenty-seven of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

**OVERT ACTS**

In furtherance of this conspiracy, and in order to effect and accomplish its objectives, one or more of the defendants committed in the Southern District of Texas the overt acts alleged in paragraphs 1 through 26 of the Superseding Indictment, and Counts Twenty-three through Twenty-seven of this Superseding Indictment, which are re-alleged and incorporated herein by reference.

**COUNT TWENTY-ONE**

**Importation of Alien for Immoral Purpose**

Beginning on or before January 1, 2009, and continuing until on or about December 31, 2011, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly import into the United States, “MAVM,” an alien, for the purpose of prostitution, and did knowingly hold “MAVM”, an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor “MAVM,” an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 1328 and 18, United States Code, Section 2.

**COUNT TWENTY-TWO**

**Importation of Alien for Immoral Purpose**

Beginning on or before April 20, 2012, and continuing until on or about July 18, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendants herein, aided and abetted by others known and unknown to the grand jury, did knowingly import into the United States, “EMR,” an alien, for the purpose of prostitution, and did

knowingly hold “EMR”, an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor “EMR,” an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 1328 and 18, United States Code, Section 2.

**COUNT TWENTY-THREE**

**Importation of Alien for Immoral Purpose**

Beginning on or before September 1, 2012, and continuing until on or about September 30, 2013, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILLIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

a defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly import into the United States, “AP,” an alien, for the purpose of prostitution, and did knowingly hold “AP”, an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor “AP,” an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 1328 and 18, United States Code, Section 2.

**COUNT TWENTY-FOUR**

**Importation of Alien for Immoral Purpose**

Beginning on or before April 1, 2016, and continuing until on or about May 5, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

RAUL MORENO-REYNA, a/k/a “CONEY,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly import into the United States, “ABP,” an alien, for the purpose of prostitution, and did knowingly hold “ABP”, an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor “ABP,” an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 1328 and 18, United States Code, Section 2.

**COUNT TWENTY-FIVE**

**Importation of Alien for Immoral Purpose**

Beginning on or before April 12, 2017, and continuing until on or about April 19, 2017, in the Southern District of Texas,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

defendants herein, aided and abetted by each other, and by others known and unknown to the grand jury, did knowingly import into the United States, “BAS,” an alien, for the purpose of prostitution, and did knowingly hold “BAS”, an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution, and did knowingly keep, maintain, control, support, employ, and harbor “BAS,” an alien, in pursuance of the importation of said alien into the United States for the purpose of prostitution.

In violation of Title 8, United States Code, Section 1328 and 18, United States Code, Section 2.

**COUNT TWENTY-SIX**

**Illegal Re-entry**

On or about September 7, 2017, in the Southern District of Texas,

JUAN CARLOS CONTRERAS CERVANTES, a/k/a “CARLOS,”

a defendant herein, an alien who previously had been denied admission, excluded, deported, and removed from the United States, knowingly and unlawfully was present in the United States when found in Houston, Texas, without having obtained consent before March 2003, from the Attorney General of the United States to reapply for admission into the United States; and without having obtained corresponding consent after February 2003, from the Secretary of the Department of Homeland Security pursuant to 6 U.S.C. §§ 202(3) and (4) and 6 U.S.C. § 557.

In violation of Title 8, United States Code, Section 1326(a).

**COUNT TWENTY-SEVEN**

**Attempted Sex Trafficking of a Minor**

From on or about December 30, 2016, to on or about March 15, 2017, in the Southern District of Texas and elsewhere,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO, a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,” a defendant herein, aided and abetted by others known and unknown to the grand jury, knowingly attempted to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate and foreign commerce, CYOP, a minor whose identity is known to the Grand Jury, knowing and in reckless disregard of the fact that CYOP had not attained the age of 18 years and that CYOP would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a) and 1594(a) and 2.



**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 1594(d))**

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

RAUL MORENO-REYNA, a/k/a “CONEY,”

ANADALIT DUARTE, a/k/a “PAOLA,” a/k/a ANN DALIT DUARTE GARCIA, and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

that in the event of conviction of an offense in violation of 18 U.S.C. §§ 1591 or 1594, the following property is subject to forfeiture:

- (1) all property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and
- (2) all property, real or personal, constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and any property traceable to such property.

**NOTICE OF FORFEITURE**  
**(18 U.S.C. § 982(a)(6); 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c))**

The United States gives notice to defendants,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”  
and

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,”

that in the event of conviction of an offense in violation of 8 U.S.C. § 1324(a), the following property is subject to forfeiture:

(1) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);

(2) all real and personal property that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);

(3) all real and personal property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense pursuant to 18 U.S.C. § 982(a)(6); and

(4) all conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense, the gross proceeds of such violation, and all property traceable to such conveyances or proceeds pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c).

**NOTICE OF FORFEITURE**

**(18 U.S.C. § 2428; 18 U.S.C. 981(a)(1)(C) and 28 U.S.C. § 2461(c))**

The United States gives notice to defendants,

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,” and

RAUL MORENO-REYNA, a/k/a “CONEY,”

that in the event of conviction of an offense in violation of 18 U.S.C. §§ 2421, 2422, or a conspiracy to commit such offense(s), the following is subject to forfeiture:

- (1) All property, real or personal, that was used or intended to be used to commit or to facilitate the commission of a violation of 18 U.S.C. §§ 2421 or 2422 pursuant to 18 U.S.C. § 2428;
- (2) All property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of a violation of 18 U.S.C. §§ 2421 or 2422 pursuant to 18 U.S.C. § 2428; and
- (3) All property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 2421 or 2422 or conspiracy to commit such offense(s) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

**NOTICE OF CRIMINAL FORFEITURE**  
**(18 U.S.C. §981(a)(1)(C) and 28 U.S.C. § 2461(c))**

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), the United States gives notice to defendants:

WILLIAM ALBERTO LOPEZ, a/k/a WILIAM ALBERTO LOPEZ-MORENO,  
a/k/a DAVID MALDONADO, a/k/a “PAYOSO,” a/k/a “PAYASO,” a/k/a “PRINCIPAL,”

ISRAEL JUAREZ SIFUENTES, a/k/a “CERILLO,” and

RAUL MORENO-REYNA, a/k/a “CONEY,”

that in the event of conviction of an offense in violation of Title 8, United States Code, Section 1328 or a conspiracy to commit such offense, all property, real or personal, which constitutes or is derived from proceeds traceable to such violation or such conspiracy are subject to forfeiture.

**PROPERTY SUBJECT TO FORFEITURE**

The property subject to forfeiture includes, but is not limited to, the following:

- (1) One (1) Glock Model 42 .380 pistol (serial number ABEN203);
- (2) One (1) Stoeger Model Cougar 800 9 mm. pistol (serial number T642913A02889);
- (3) One (1) Smith and Wesson Model BG380 .380 pistol (serial number KAX2833);
- (4) One (1) Smith and Wesson Moel SW40VE .40 caliber pistol (serial number PBD3743).
- (5) One (1) 2007 black Chevrolet Trailblazer;
- (6) One (1) 2013 grey Dodge Ram pickup;
- (7) One (1) 2006 white trailer with VIN 1GRAA06216W705993; and
- (8) One (1) 2006 blue Peterbilt Motors Co. tractor with VIN 1XPFD9X26N642109.

**Money Judgment**

Defendants are notified that upon conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

**Substitute Assets**

Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.


A TRUE BILL:

Original Signature on File

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FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI  
United States Attorney, Southern District of Texas

  
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Adam Goldman  
Assistant United States Attorney